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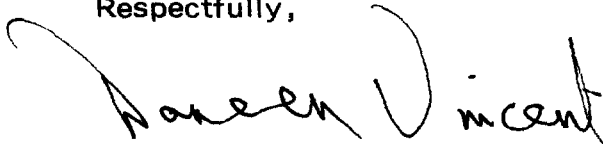
Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

EX PARTE OR LATE FILED

Dear Ms. Salas:

I thank the FCC for the opportunity to submit paper comment on the Notice of Proposed Rulemaking. Since I would like each member of the Commission to receive a copy of my submission, I have enclosed an original and 9 copies. I am also enclosing a computer diskette for the benefit of any FCC commissioner or FCC Disability Task Force member who may benefit from this alternative format.

Respectfully,



Doreen Vincent

File of Copies rec'd
11/1/98

OHIO

Doreen Vincent
1837 Losantiville Ave., ML 204E
Cincinnati, Ohio 45237
Tel/Fax: (513) 731-7705

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OBJECTIVES

To creatively communicate information that is geared toward the public's interest and need.

EDUCATION

(Post disability) Received a Broadcast Arts & Management degree from Southern Ohio College in Cincinnati Ohio in October 1983. Magna Cum Laude graduate.

(Pre-disability) Scholastic aptitude earned admission to Dame Edith Owens School for Exceptional Achievers in London England.

PROFESSIONAL EXPERIENCE

(Post disability) As Editor in Chief/Public Information Specialist for Ohio's Hamilton County Community Mental Health Board, organized and coordinated information and education efforts with the county's 100+ mental health service deliverers, their boards and committees.

Independently produced, conceptualized, scripted, directed, narrated diverse video programs including documentaries and entertainment programming for the City of Cincinnati; Boone County Kentucky, Juvenile Court; Kenton County, Kentucky, Education System; Storer Cable; Women in Communications; Greater Cincinnati Literacy Network; State of Ohio Rehabilitation Services Commission; Canada's Disabled Peoples' International.

PERSONAL DATA

(Pre disability) Obtained American citizenship in 1964

(Post disability) In 1989, founded Ability Today, Inc., and obtained 501(c)(3) status for the specific purpose of accessing state/federal funds in order to increase the independence, productivity, and employment potential of disabled Americans across the country. (501(C)(3) status stands, but agency is currently inert.)

(Post Disability) Unencumbered/free to travel independently

AWARDS (Post disability)

Warner Cable Blue Chip Media Award
National Federation of Local Cable Programming Award
State of Ohio Public Images Video Production Award
Southwest Ohio Rehabilitation Association Media Award
Southwest Ohio Lung Association Media Award

HONORS (Post disability)

Listed in Easter Seals National Directory of "People Who Make a Difference" (1993)
Named Southwest Ohio's Professional Disabled Woman of the Year by the President's Committee on Employment of People with Disabilities/Pilot Club International (1990)

EX PARTE OR LATE FILED

VW PRODUCTIONS**1837 Locustville Ave., NL 284E, Cinti., Ohio 45237. Tel/Fax: (513) 731-7705**

May 7, 1998

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MAY 11 1998

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Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

Honorable Commissioners:

Much comment has been extended as to how telecommunication products can be made accessible to/for people with disabilities. And accommodations have been made, rightfully so, for segments of the disabled community, i.e., people with sight and hearing impairments. As an informed video producer with a disability, I respectfully submit comment regarding broadcast television's principal service, the transmission of video product through the public airwaves. This key television service currently *"tends to screen out"* the disabled community as a whole.

Census data reveals that citizens with disabilities account for about **twenty percent** of the nation's population. Living with these individuals is at least an equal number of family members and care givers. Despite this, sources such as the Washington based Community Media Review, estimate that disability and disability related issues receive a disproportionate **one percent** coverage by America's teleculture (*see attached.*)

Integration of individuals with disabilities into the mainstream of society is fundamental to the purposes of the ADA. And while the FCC uses different language than the ADA, it too holds that television stations have a responsibility to provide a balanced service that meets the *varied* needs of its home community. But, eight years after passage of the ADA, and contrary to FCC directives, the nation's teleculture continues to subjectively and unequally service the needs and interests of the disabled community—America's largest minority.

While an increasing number of today's disabled citizenry is attending school, taking part in recreational activities, and working in professions ranging from Senator to school teacher, television continues to put a charitable spin on their sparse disability coverage—for the most part, portraying disabled people as helpless victims or super heroes. These munificent portrayals are neither in the best interest of the general public, nor are they in the best interest of the disabled community—exploitation for dramatic effect tends to support, not remove, attitudinal barriers for people with disabilities.

The largest single determinant effecting public attitudes and opinion, is the media—in particular television. It is reasonable to expect that ongoing coverage of pivotal disability matters would (a) serve to improve attitudes about disability; (b) serve to promote integration of citizens with disabilities into the social and economic mainstream of life; and (c) serve to decrease disability payments while adding to the nation's economy. **These** are matters of public interest.

There is strong support for television to provide more equitable, meaningful,

television service to the community of people with disabilities. Congress/the ADA noted that discrimination against disabled people remains pervasive in critical areas such as communication. The United Nation's World Program of Action Concerning Disabled Persons urged, "Disabled persons should be given equal media access so that they can freely communicate their points of view to the general public." National Easter Seals created the **EDI** awards in order to foster media efforts that encourage *e* quality, *d*ignity, and *i*ndependence of people with disabilities.

The disabled community does not seek to alter television's central service, but rather it seeks a good faith reasonable response effort from America's teleculture to more fairly and factually include matters of import to the disabled community in their news coverage. This can be "readily and easily achieved" by television networks and independents alike.

Less than one percent of professionals working in television today are people with disabilities, according to census data. A more responsive equal employment opportunity outreach to qualified producers, editors, reporters, and consultants with disabilities therefore is a correction that *could and should* be "readily achieved" by today's teleculture.

Also, digital production technology is now widely used by the television industry. This technology so simplifies the production process it allows qualified disabled production staff could easily produce disability issue programs. It also allows disabled freelance producers can contract with the TV industry to cost

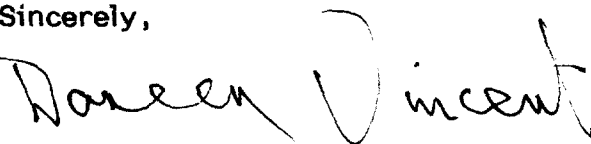
effectively create disability issue programs. Programs that by design could inform and entertain a "universal" viewing audience. Programs that could more likely than not enhance the image and profit of TV stations that bought and aired them.

As a staunch advocate/professional producer with a disability, I am encouraged by the Notice of Proposed Rulemaking statements of, **Commissioner Powell**: *"The principal of universal service is ultimately inclusion, and the disabled community should not be overlooked"*; **Commissioner Tristani**, *"unemployment among people with disabilities is roughly 73 percent (and) telecommunications is at the core of our society—it is, increasingly, how we communicate with one another, how we learn, how we work;* and **Commissioner Furchtgott-Roth**, *"we have here an opportunity for rational regulation and a role for the federal government."*

In response to FCC's request for comment on "readily achievable" defenses.

I respectfully submit I know of no defense to unduly disregarding either ADA law, FCC mandate, and/or EEOC regulation.

Sincerely,

A handwritten signature in black ink that reads "Doreen Vincent". The signature is written in a cursive, flowing style.

Doreen Vincent
1837 Losantiville Ave., ML 204E
Cincinnati, Ohio 45237
Tel/Fax: (513) 731-7705

attachment

DOCUMENT OFF-LINE

This page has been substituted for one of the following:

- o An oversize page or document (such as a map) which was too large to be scanned into the RIPS system.

- o Microfilm, microform, certain photographs or videotape.

- o Other materials which, for one reason or another, could not be scanned into the RIPS system.

The actual document, page(s) or materials may be reviewed by contacting an Information Technician. Please note the applicable docket or rulemaking number, document type and any other relevant information about the document in order to ensure speedy retrieval by the Information Technician.

1 DISKETTE